

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

David Haverkamp,
TDCJ No. 00702013
Plaintiff,

v.

Joseph Penn, et al.,
Defendants.

Civil No. 2:17-cv-00018

Exhibit A

United States District Court
Southern District of Texas
Corpus Christi Division

Bobbie Lee Haverkamp
AKA. Haverkamp
Plaintiff

vs

Civil Action
2:17-CV-18

Doctor Linthicum, Jumper,
Hudson, Keiser, Benson
Johnson, Barruso, Wyck
Beeson, Budgewater
Defendants

Acting for the University
Directors of Mental/Medical
Services and Senior Medical
Authorities for treatment
plans and hormone therapy
related to GID.

This request for
Production of Documents
supercedes all previous
requests.

Dated: Jan 6, 2021
Ms Bobbie
Plaintiff

Plaintiff's Direct Request
for Production of Documents

To the Honorable Corbello,

Now Comes, Ms Bobbie,
AKA the Plaintiff in the above Civil Action
and request Production of Documents
based on Holloway - V. Lockhart, 813 F2d 874
that Parties may obtain discovery without
motion or Court orders.

The Court ordering the Defendants to answer
the above Civil Action supercedes any
previous "Protective Order" the Defendants
enjoyed.

Please mail All Documents to Stiles
Mailroom, Beaumont Texas.

- 1) Produce the Mission statement of the
Office of Profession Standards TDCJ
Health Service Division.
- 2) Name the individual in charge of
the Office of Professional Standards and
who does their supervisor report to.
- 3) Produce the orgation chart for the office
of Professional Service Standards for TDCJ
and how UTMBS Medial Services are tied together.

4). Dr. Joseph Penn was a named Defendant in the above civil action, Dr. Penn was released due to he could not provide relief.

The Plaintiff has read official recordings on Medical by Dr. Penn.

4A. Show who Dr Penn reports to.

4B. Produce any meetings that change Medical Policy that involves Transgender Health. under Policy G-51.11.

5). Produce the 7th Edition of the WPATH Standard of Care for the health of Transgenders, Transsexual, and Gender non-conforming people

6) The 7th Edition of WPATH is listed as a attachment to Policy G-51.11, produce how the 7th Edition of WPATH binds to Policy 51.11, dated 5/16/2012

7) Produce the Approved Medical Standard of Care that is accepted in the Medical Community, that the Office of Professional Standards uses to gauge the proper treatment for Gender Dysphoria.

8. I am looking for 4 particular years - 2012, 2013, 2014, 2017.

- On page 22 of 23, document 62-1 filed in TXSD on 10/05/17, you will notice the Document G-51.11 - Treatment of Offenders with Gender Disorders. Go to IV, it says:

"The University Directors of mental Health Services and University Regional or Senior Medical Directors will be the Approving Authorities for treatment plans and Hormone therapy related G.I.D."

A • Show the year that was deleted from Policy G-51.11, dated 5/16/2012

B • ^① Produce the official Transcripts of the CMHC removing it, ^② also the name of principle actors involved.

C. • Show the vote of the CMHC on its removal # yes votes, # No votes

D • Dr Luthicem is TDCJ-Health Services Director, she enforces policy per Court records. Show the Date she approved this deletion and any documents involved.

E. Produce the University Directors of mental Health for the years 2012, 2013, 2014, 2017 that were responsible for treatment plans and hormone therapy for the treatment of GID under Policy G-51.11 dated 5/16/2012

F. Please do the same for the University regional or Senior medical Directors.

G. Show the organizational chart for these positions and who these people report to.

H. Produce Dr. Gordon supervisors and show a organization chart of who Dr. Gordon supervisor reports to.

9. Produce the following documents from the 7th Edition of WPATH Standard of Care that is part of the attachments that Professional Services of TDCJ named.

A. Development Stages of the Transgender Coming out process by Backing, W.D Coleman E (2007)

9. cont

B. Preventive Care of the Transgender Patient
by Fieldman, J (2007)

C. Surgical Treatment of Gender Dysphoria
in Adults and Adolescents by Gus
Lebreuwyer (2007)

D. American Medical Association, 2008- Resolution
122 CA-08

E 2008, Psychotherapy and the real
life experience by

F. 2008 Perception of Voice Transgender
Client, Journal of voice

G. 2008 World Health Organization for
Transgender Health, WPATH clarification
on medical necessity of treatment, sex
reassignment and insurance coverage
in the USA.

H. Towards Version 7th of the World
Professional Association for Transgender
Health.

13. Policy G-51.11, dated 5/16/2012 under went revisions.

Produce the changes and the Policies from 2012 to the present

Produce the official public records that authorized the changes

14. The 51.11 was under went changes, show how the WPATH website supports these changes, how does it Bind to Policy 51.11

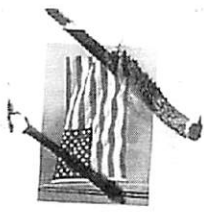
Honorable Corbello,

Enclosed request for production of Documents. I will expect deliver, mailed to Stiles Mail room by the end of Feb 2021

Sincerely

Ms Bobbie.

Jan 6, 2021



RECEIVED
JAN 25 2021
LEDD

Texas Attorney General - Corbello
ROUTED IN MAIL CENTER
P.O. 12548
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JAN 22 2021
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Haverkamp, D
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